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Counsel for Defendant FCA US LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOSE CHAVEZ, individually
and on behalf of all others
similarly situated,

Plaintiff,

v.

FCA US LLC, a Delaware
Limited Liability Company;
ROBERT BOSCH GMBH, a
corporation organized under the
laws of Germany; and ROBERT
BOSCH LLC, a Delaware
Limited Liability Company,

Defendants.

No. 3:16-cv-06909-EMC

**STIPULATION ENLARGING FCA
US LLC'S AND ROBERT BOSCH
LLC'S TIME TO RESPOND TO
THE COMPLAINT AND SETTING
BRIEFING SCHEDULE**

Judge: Honorable Edward M. Chen

1 WHEREAS, on December 1, 2016, plaintiff Jose Chavez ("Plaintiff")
 2 commenced the above-captioned action by filing a complaint (the "Complaint")
 3 against FCA US LLC, Robert Bosch LLC (together, the "Served Defendants") and
 4 Robert Bosch GmbH¹;

5 WHEREAS, on December 13, 2016, Plaintiff served the Complaint on
 6 the Served Defendants;

7 WHEREAS, Plaintiff and the Served Defendants have met and
 8 conferred and have agreed to extend the time for the Served Defendants to answer,
 9 move, or otherwise respond to the Complaint and, in the event the Served
 10 Defendants move to dismiss the Complaint, on a briefing schedule for the motions;

11 NOW, THEREFORE, IT IS HEREBY STIPULATED AND
 12 AGREED, by and among the parties hereto, through their undersigned counsel, as
 13 follows:

14 1. The Served Defendants shall respond to the Complaint on or
 15 before March 9, 2017.

16 2. In the event the Served Defendants move to dismiss the
 17 Complaint, Plaintiff's opposition papers are due on or before April 10, 2017.

18 3. In the event the Served Defendants move to dismiss the
 19 Complaint, the Served Defendants' reply papers are due on or before May 3, 2017.

20 4. Neither Plaintiff nor the Served Defendants waive their rights to
 21 seek from each other or the Court additional adjournments or extensions of the
 22 above deadlines.

23 5. By entering into this stipulation, the Served Defendants do not
 24 waive, and they expressly preserve, all defenses, including all defenses under Fed.
 25 R. Civ. P. 12(b).

26
 27 ¹ Plaintiff has not effected service on Robert Bosch GmbH.

1
2 Dated: December 29, 2016

Respectfully submitted,

3 /s/ Robert J. Giuffra, Jr.

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14 *Counsel for Defendant FCA US LLC*

15 Dated: December 29, 2016

Respectfully submitted,

16 /s/ Matthew D. Slater (with permission)

Matthew D. Slater (*pro hac vice to be*
17 *filed*)

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21 *Counsel for Defendant Robert Bosch*
22 *LLC*

1 Dated: December 29, 2016

Respectfully submitted,

2 /s/ Shana E. Scarlett (with permission)

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13 *Counsel for Plaintiff and the Proposed*
14 *Classes*

ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest that
concurrence in the filing of this document has been obtained from the signatories.

Dated: December 29, 2016

SULLIVAN & CROMWELL LLP

/s/ Robert J. Giuffra, Jr.
Robert J. Giuffra, Jr.